

Department of Energy

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ROCKY FLATS OFFICE P.O. BOX 928 GOLDEN, COLORADO 80402-0928

93-DOE-04565

MAY 0 4 1993

Mr. Gary Baughman
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Colorado Department of Health
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Mr. Martin Hestmark
U. S. Environmental Protection Agency, Region VIII
ATTN: Rocky Flats Project Manager, 8HWM-RI
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Denver, Colorado 80202-2405

Gentlemen:

The U.S. Department of Energy-Rocky Flats Office (DOE-RFO) has experienced significant delays to the Operable Unit No. 4 (OU4) Solar Evaporation Ponds (SEP) Phase I RFI/RI Program. This correspondence forwards a justification (including 4 supporting attachments) for requesting milestone extensions for the submittal of the OU4 Draft and Final Phase I RFI/RI reports. Primary justification for these delays includes unanticipated requirements associated with the logistics of field mobilization, discrepancies between the Interagency Agreement (IAG) schedule assumptions for OU4 and the actual durations incurred, and delays caused by the conditional approval of the OU4 Final Phase I RFI/RI Work Plan. Such delays have combined to a total duration of 18 months. However, aggressive task and schedule management efforts have allowed the recovery of several months, resulting in a projected schedule extension request of 11 months, as reflected in the proposed commitment schedule.

In accordance with the Rocky Flats Plant (RFP) IAG, DOE-RFO is hereby requesting a Table 6 milestone extension for OU4 SEP for the Draft Phase I RFI/RI Report and the Final Phase I RFI/RI Report. The IAG milestone extension is requested per "Chapter I, Part 42 Extensions, Paragraphs 221-227," of the IAG. The current IAG milestones and the requested commitment dates for the OU4 Draft Phase I RFI/RI Report and Final Phase I RFI/RI Report are as follows:

IAG Deliverable	IAG Schedule	Commitment Schedule
Draft Phase I RFI/RI Report	5-21-93	4-19-94
Final Phase I RFI/RI Report	10-18-93	9-17-94

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The DOE believes that all other future OU4 IAG milestones should be met on schedule, provided the U.S. Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) support the OU4 IAG compliance strategy described in the attached justification to this letter. We request a meeting with EPA and CDH to discuss these issues in detail at the earliest convenient time. Please feel free to contact me if you have any questions or comments pertaining to this matter.

Sincerely,

A. H. Pauole
Acting Manager

Enclosures

cc w/Enclosures:

A. Rampertaap, EM-453

J. Ciocco, EM-453

H. Belencan, EM-453

R. Schassburger, ERD, RFO

E. Lee, EG&G

JUSTIFICATION AND RATIONALE FOR EXTENSIONS TO OU4 DRAFT PHASE I RFI/RI REPORT AND FINAL PHASE I RFI/RI REPORT

Mobilization Delays

Unanticipated and previously unscheduled tasks were required for mobilization of the OU4 Phase I RFI/RI Field Program. Although DOE and EG&G Rocky Flats, Inc. (EG&G) expected numerous and complicated logistics for mobilization, it was not anticipated to require four months (August 3, 1992 - December 14, 1992). The RFP IAG allows one month for all RFI/RI mobilization tasks. The following list details requirements for mobilization of the OU4 Phase I RFI/RI Program.

1) Training:

- General Employee Training;
- Radiation Worker Training;
- Radiation Protection Training;
- Respirator Fit Test and Training;
- Building Indoctrination;
- Radio Communication Training;
- Standard Operating Procedure Training;
- Core Logging Training;
- Decontamination Pad Training;
- Drum Training; and
- Data Management Training.

2) General Permits:

- Integrated Work Control Package Waiver;
- Land Use Request;
- Buffer Zone Passes;
- Badges and Dosimeters; and
- Soil Disturbance Permit.

3) Equipment Procurement:

- Field Trucks;
- Drilling Rigs;
- Personal Protective Equipment;
- Decontamination Supplies;
- Radiation Detectors;
- Core Logging Supplies;
- Soil Sampling Equipment; and
- Vadose Zone Monitoring Equipment.

4) Documentation Requirements:

- Implementation Plan;
- Health and Safety Plan; and
- Vadose Zone Technical Memorandum.

5) Health and Safety:

- Equipment Calibration;
- Radiation Survey of Equipment;
- Property Transfer Forms; and
- Radiation Work Permits.

Additional complications and consequent impacts to the OU4 schedule were incurred by the following issues:

- In October 1992, the SEP IHSS 101 was designated a Radiological Controlled Area (RCA). The designation of the Ponds as an RCA has created additional unforeseen and unscheduled Health and Safety and logistical requirements;
- Support equipment, including a field trailer, equipment storage facilities, and radiation instrumentation was extremely difficult to obtain due to the number of remedial investigations conducted simultaneously at RFP;
- Numerous coordination meetings with various plant support organizations for OU4:
- The security requirements associated with accessing the RFP Protected Area (PA) were vastly more time consuming than expected and previously scheduled.

The total delays incurred for the OU4 mobilization tasks amount to three months.

IAG Assumptions

Critical IAG assumptions relative to activity durations were used for planning and implementing the OU4 Phase I RFI/RI field program which are no longer accurate or valid. Specific examples of durations exceeding the IAG durations for critical path activities include:

Critical Path Activities	IAG Duration	Actual Duration	Incremental <u>Delay</u>	Cumulative Incremental Delay
Procurement (OU4 Work Plan Implementation)	0 days	126 days	126 days	126 days
Vadose Zone Instrumentation (16 boreholes at two days per borehole)	0 days	32 days	32 days	158 days
Radiological Analysis	63 days	75 days	12 days	170 days
Data Validation	21 days	45 days	24 days	194 days
Baseline Risk Assessment (Toxicity Tech Memo on Critical Path)	0 days	35 days	35 days	229 days (total)

In general, a number of critical path activities were either not included or were assumed in the IAG to require less time than what was actually necessary for the OU4 implementation. Consequently, these activities have contributed to the OU4 Phase I RFI/RI schedule delay by approximately 229 working days or 11 months.

Work Plan Approval

The OU4 Draft Final Phase I Work Plan was submitted to CDH and EPA on November 26, 1991. Regulatory agency correspondence was received on December 20, 1992 indicating the work plan was not approved pending resolution of deficiencies. The revised OU4 work plan was submitted to CDH and EPA on February 5, 1992, and the statement of work (SOW) for implementation of the work plan was transmitted to procurement on February 14, 1992 as a competitive bid contract. Conditional approval for the OU4 Final Phase I RFI/RI Work Plan was received from CDH and EPA on May 8, 1992. Since the DOE and EG&G did not believe it would be cost effective for a subcontractor to propose on the implementation of the unapproved OU4 Work Plan, the work plan approval process delayed the procurement of the OU4 implementation. The total delay incurred from the OU4 Work Plan approval process was four months. The timeline contained in Attachment A outlines the scheduling impacts of the OU4 Phase I RFI/RI Work Plan regulatory and procurement processes.

SUMMARY OF JUSTIFICATION AND RATIONALE FOR EXTENSIONS

To summarize, the total cumulative delay incurred during the OU4 Phase I RFI/RI Program is as follows:

Reasons	Schedule Delay
Unanticipated Mobilization Requirements	3 Months
Inaccurate IAG Assumptions	11 Months
OU4 Phase I RFI/RI Work Plan Approval Delay	4 Months
Total Cumulative Delay	18 Months

PROPOSED STRATEGY FOR FUTURE IAG COMPLIANCE

The DOE-RFO, DOE Headquarters, and EG&G-RF consider the OU4 SEP program to be of extraordinarily high priority for RFP remedial activities. The DOE has taken every effort to mitigate the delay by assigning additional resources and conducting as many tasks as possible in parallel. However, logistics within the RFP and PA prevent the utilization of unlimited resources. Due to the high priority of this project, the DOE has developed a strategy to potentially recover the IAG schedule. A total reduction of eight months delay is targeted, resulting in a net delay of 10 months if we are completely successful in the future. A commitment for a net delay of 11 months is proposed. However, it is important to understand and recognize that this approach is extremely aggressive and costly, and may not be feasible for other OUs.

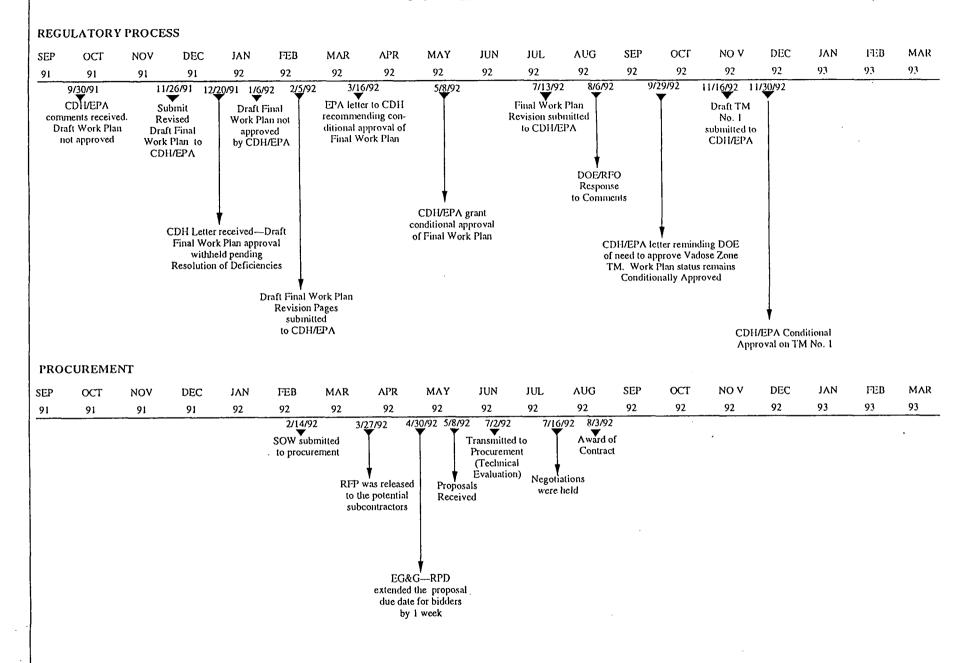
Attachment B is a graphical presentation of the DOE's strategy which reflects full-recovery of the IAG schedule subsequent to the OU4 Final Phase I RFI/RI Report. The DOE believes that the Interim Measure/Interim Remedial Action (IM/IRA) Decision Document, IM Design and Construction and Phase II IAG requirements can all be met with the support from EPA and CDH. The DOE and EG&G will have a contract awarded under the Master Task Subcontract (MTS) program in June 1993 which will include the following IAG requirements:

- Treatability Study (if applicable);
- IM/IRA Decision Document;
- Phase II RFI/RI Work Plans (Draft and Final);
- Phase II RFI/RI field activities; and
- Phase II RFI/RI Reports (Draft and Final).

By integrating these functions into one contract, the DOE and EG&G can save approximately 376 working days in procurement time and create a more efficient program by utilizing one team of contractors rather than multiple contractors for various requirements. The DOE believes that this approach, with CDH and EPA support, will enable future compliance with the IAG schedules for OU4.

This recovery strategy is the basis of the OU4 Phase I RFI/RI Commitment Schedule contained in Attachment C. The schedule represents the DOE's best estimate for submitting the Phase I RFI/RI Draft and Final Reports and includes the mobilization tasks, durations of the tasks, and start and finish dates. The schedule also includes contingencies for potential delays occurring beyond the control of the DOE. Specifically, the laboratory analysis and data validation tasks were extended by two weeks each, resulting in a total extension of one month to the schedule. Through aggressive management and control of the project activities on the schedule, contingency for such impacts, if not actually experienced, would allow earlier completion of subsequent tasks and compression of the entire schedule. Similar tight management of the schedule of the Interceptor Trench System Diversion project schedule allowed actual completion of the project eight days prior to the date agreed upon by CDH, EPA, and DOE. Attachment D is a summary of the critical near term activities. In the event: 1) horizontal drilling is required beneath the 207 B&C series ponds, as a result of analyses of the liner and underlying soils, and/or 2) Technical Memoranda, in addition to those currently scheduled, are required, the proposed schedule will require revision.

ATTACHMENT A OU4 TIMELINE OF EVENTS



"OU4 TIMELINE OF EVENTS"

ATTACHMENT B ... OU4 - SOLAR PONDS STRATEGY FOR IAG COMPLIANCE

SEP DEC MAR JUN SEP DEC 96 96 96 96 97 97 97 97 93 94 94 94 94 95 95 95 9/94 5/2 V93 10/18/93 DRAFT REPORT FINAL REPORT DRAFT REPORT FINAL REPORT PHASE I RFVRI **BUFFER ZONE** 12/14 PA AROUND PONDS ▲ = IAG Milestone **RCA DRILLING** = Target Milestone (NON-POND) * = Baseline Pond Cleanout Date POND 207A D = Drilling POND 207B A = Analysis of Samples (CENTER) V = Validation of Data POND 207B (NORTH) POND 207C 11/95 POND 207B (SOUTH) DRILLING PROGRAM **PROGRESS** (12/18) (15/18) 66% 83% (18/18)100% % BOREHOLE 50% 33% PONDS DATA ANALYZED 70% 85% 100% 55% % OF POND AREA REPRESENTED (52/52) (46/52) (49/52) 8/52) (40/52) (43/52)83% 89% 94% 100% 15% 77% % BOREHOLE ZZZOU4 DATA ANALYZED 24% 83% 88% 92% 96% 100% % OF OU4 AREA REPRESENTED 2/14/94 TREATABILITY STUDIES Il applicable 10/12/93 4/94 9/12/94 4/24/95 IM/IRA DEC DOC DRAFT FOR PUBLIC FINAL COMMENT 10/23/98 1/26/95 5/25/95 2/26/96 1/29/97 IM DESIGN AND CONSTRUCTION TITLE III DESIGN TITLE DRAFT TITLE II FINAL TITLE II BEGIN CONSTRUCTION

7/18/95

END

FIELDWORK

4/16/96

DRAFT

REPORT

9/11/96 10/10/96

REPORT

11/17/93

4/22/94

DRAFT

PHASE II WP

9/19/94 11/16/94

FINAL BEGIN

FIELDWORK

PHASE II RFI/RI

ATTACHMENT C

	OU4 SOLAR PONDS PHASE I RFI/RI COMMITMENT SCHEDULE						
ID	Task Name	Duration	Sched St	Sched Fin	Predecessors		
1	REGULATORY (IAG) MILESTONES	106d	5/21/93	10/18/93			
2	Submit Draft Phase I RFI/RI Report to EPA/CDH	0d	5/21/93	5/21/93			
3	Submit Final Phase I RFI/RI Report to EPA/CDH	0d	10/18/93				
4				10,10,00			
5	POND ACCESS/CLEAN AND DRY	812d	10/20/92	11/30/95	<u> </u>		
6	Pond 207A	0d	10/20/92	10/20/92			
7	Pond 207B-Center	0d	9/30/93	9/30/93			
8	Pond 207B-North (not accessible during phase I)	00	9/30/94	9/30/94			
9	Pond 207B-South (not accessible during phase I)	0d	11/30/95				
10	Pond 207C (not accessible during phase I)	00	11/30/94	11/30/94			
11	(not accessible during phase i)	- 00	11/30/94	11/30/94			
12	CONSTRUCT PA DECON PAD	28.3w	8/10/92	2/23/93			
13	CONSTRUCT FA DECON FAD	20.3W	0/10/92	2/23/93			
14	WORK PLAN IMPLEMENTATION	6074	8/3/92	11/20/04			
15	Contract Award	607d	8/3/92	11/29/94			
16		b0	8/3/92	8/3/92			
	Kick-Off Meeting - AE	0d	8/13/92	8/13/92			
17	Kick-Off Meeting - EG&G	0d	8/18/92	8/18/92			
18	PROJECT MANAGEMENT	604.88d	8/5/92	11/29/94			
19	Weekly Project Meetings	604.88d	8/5/92				
20	First Meeling	1.5h	8/5/92	8/5/92			
21	Last Meeling	D0	11/29/94	11/29/94	488FF		
22	Monthly Accrual Cost Tracking	593d	8/21/92	11/29/94			
23	Submit First Report	D0	8/21/92	8/21/92	15		
24	Submit Last Report	0d	11/29/94	11/29/94	488FF		
25	Bi-weekly Progress Tracking & Reports	581d	9/8/92	11/29/94			
26	Start Progress Tracking	0d	9/8/92	9/8/92			
27	Stop Progress Tracking	Dd	11/29/94	11/29/94	488FF		
28	Justification for Visit Forms	570d	8/18/92	10/24/94			
29	Submit First Months Form	1.8w	8/18/92	8/28/92	17		
30	Submit Last Months Form	0.8w	10/19/94	10/24/94	488FS-30d		
31	PROJECT PLANNING	520d	8/3/92	7/30/94			
32	Health & Safety Plan	51d	8/13/92	10/23/92			
33	Prepare Plan	16d	8/13/92	9/4/92	16		
34	EG&G Review	14d	9/4/92	9/24/92			
35	Finalize Plan	11d	9/24/92	10/9/92	34		
36	Submit Final Plan	00	10/9/92	10/9/92	35		
37	EG&G Final Review	10d	10/9/92	10/23/92	36		
38	Vadose Zone, Tech Memo No. 1 & SOPS	172d	8/24/92	4/20/93			
39	Prepare Tech Memo	37d	8/24/92	10/13/92			
40	Submit Draft Tech Memo to EG&G/DOE	0d	10/13/92	10/13/92	39		
41	EG&G/DOE Review	13d	10/14/92	10/30/92			
42	Incorporate Comments	7d	11/2/92	11/10/92	141		
43	Transmittal Processing - DOE/RFO	2d	11/11/92	11/12/92			
44	DOE/EG&G Final Combined Review	2d	11/13/92	11/16/92			
45	Transmit to CDH/EPA	0d	11/16/92	11/16/92	144		
46	EPA/CDH Review	10d	11/17/92				
47	EPA/CDH Review EPA/CDH Conditional Approval of TM	0d (11/30/92	11/30/92	140		
48	Resolve Comments & Finalize Tech Memo	11d	12/1/92	12/15/92	40		
	Tresoure Comments of Finance Fecti Mento	110	12/1/92	12/10/92	141		

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OU4 SOLAR PONDS	PHASE	L REIZRI	COMMITMENT	SCHEDULE

ID	Task Name	Duration	Sched St	Sched Fin	Predecessors
49	Transmit Final TM to DOE-RFO	0d	12/15/92	12/15/92	
50	Transmit Final TM to CDH/EPA	0d	12/15/92	12/15/92	
51	EPA/CDH Final Approval	18w	12/16/92	4/20/93	50
52	Modifications to Field Activities, Tech Memo No. 2	98d	1/26/93	6/10/93	
53	EPA/CDH Meeting - Approval to Proceed w/ TM	1d	1/26/93	1/26/93	
54	Prepare Tech Memo	3.3w	1/27/93	2/18/93	52
	Submit Draft TM to EG&G/DOE	0d	2/18/93	2/18/93	
55		3d	2/18/93	2/23/93	J4 EE
56	EG&G/DOE Review		2/23/93	3/15/93	
57	Incorporate Comments and Expand Memo	2.9w	3/15/93	3/15/93	50
58	Submit Revised Draft TM to EG&G/DOE	0d			
59	EG&G/DOE Review	2w	3/16/93	3/29/93	
60	Incorporate Comments	1.2w	3/30/93	4/6/93	
61	Transmittal Processing - EPA/CDH	2d	4/7/93	4/8/93	
62	EPA/CDH Review	4w	4/9/93	5/6/93	
63	Resolve Comments & Finalize Tech Memo	2w	5/7/93	5/20/93	
64	Submit Final TM	0d	5/20/93	5/20/93	
65	EPA/CDH Final Approval	3w	5/21/93	6/10/93	64
66	Environmental Evaluation, Tech Memo No. 3	190.5d	8/19/92	5/12/93	
67	Prepare EE Working Document	82d	8/19/92	12/10/92	16
68	Submit Draft EEWD to EG&G	0d	12/10/92	12/10/92	
69	EG&G Review	4w	12/11/92	1/7/93	68
70	Incorporate Comments into EEWP	0.2w	1/8/93	1/8/93	
71	Submit Revised Draft EEWD to EG&G/DOE	0d	1/8/93	1/8/93	70
72	EG&G/DOE Review	3w	1/8/93	1/28/93	71
73	Prepare Draft EE Tech Memo	4.8w	1/14/93	2/16/93	
74	Submit Draft EE Tech Memo to EG&G/DOE	0d	2/16/93	2/16/93	
75	EG&G/DOE Review	2.7w	2/16/93	3/5/93	74
76	Incorporate Comments into TM	1w	3/5/93	3/12/93	75
77	Submit Revised EE Tech Memo to EG&G/DOE	0d	3/12/93	3/12/93	76
78	Transmittal Processing - EPA/CDH	1d	3/12/93	3/15/93	77
79	EPA/CDH Review	4w	3/15/93	4/12/93	78
80	EPA/CDH Conditional Approval for EE Tech Memo	0d	4/12/93	4/12/93	79
81	Resolve Comments & Finalize Tech Memo	1w	4/12/93	4/19/93	80
82	Submit Final EE Tech Memo to EG&G/DOE	0d	4/19/93	4/19/93	81
83	Transmittal Processing - EPA/CDH	2d	4/19/93	4/21/93	82
84	EPA/CDH Final Review and Approval	3w	4/21/93	5/12/93	83
85	Training	168d	8/3/92	3/24/93	15
86	General Employee Training	154d	8/18/92	3/19/93	
87	First Class	4h	8/18/92	8/18/92	
88	Last Class	8h	3/19/93	3/19/93	
89	Radiation Worker Training	156d	8/19/92	3/24/93	
90	First Class	1300 1d	8/19/92	8/19/92	
	Last Class	1d	3/24/93	3/24/93	
91		3d	9/3/92	9/7/92	
92	Radiation Protection Training		9/3/92	9/7/92	
93	September 3rd Class	3d			
94	Respirator Fit Test & Training	33d	8/27/92	10/12/92	
95	First Fit	4h	8/27/92	8/27/92	
96	Last Fit	8h	10/12/92	10/12/92	

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OU4 SOLAR PONDS PHASE I RFI/RI COMMITMENT SCHEDULE

ID	Task Name	Duration	Sched St	Sched Fin	Predecessors
97	Building Indoctrination	80.06d	8/20/92	12/10/92	
98	First Indoctrination	0.5h	8/20/92	8/20/92	
99	Last Indoctrination	0.5h	12/10/92	12/10/92	
100	Radio Communication Training	73d	8/31/92	12/10/92	
101	First Training	0d	8/31/92	8/31/92	
102	Last Training	0d	12/10/92	12/10/92	
103	SOP Training	89d	8/3/92	12/4/92	
104	First Training	0d	8/3/92	8/3/92	
105	Last Training	0d	12/4/92	12/4/92	
106	Core Logging Training	75d	8/7/92	11/19/92	
109	Decontamination Pad Training	0.1w	11/5/92	11/5/92	116
110	Drum Training	2h	12/9/92	12/9/92	
111	RFEDS Training	16.16d	11/16/92	12/8/92	
114	Site Base Map Preparation	13w	9/8/92	12/7/92	17
115	Mobilization	132d	8/3/92	2/2/93	
151	Plan of the day meetings	455d	11/2/92	7/30/94	
154					
155	FIELDWORK	379d	11/10/92	4/22/94	37
156	Ground Water Level Measurements	14w	3/17/93	6/22/93	
157	Obtain borehole/utility clearances	61d	12/10/92	3/5/93	
158	First Borehole Clearance	0d	12/10/92	12/10/92	
159	Last Borehole Clearance	0d	3/5/93	3/5/93	170,174,180,185,189
160	Pre-Work RAD Survey	61d	12/10/92	3/5/93	
161	Start Survey	0d	12/10/92		158SS+1d
162	Finish Survey	0d	3/5/93		159FF
163	OU Wide Radiological Survey	100d	11/12/92	4/1/93	
164	Start RAD Survey	b0	11/12/92	11/12/92	
165	Finish RAD Survey	0d	4/1/93	4/1/93	189FF
166	OU Wide Surface Soil Sampling	89d	12/11/92	4/14/93	
167	Random Surface Soil Sampling	3.6w	12/11/92	1/5/93	
168	Discrete Surface Soil Sampling	2w	4/1/93	4/14/93	163
169	Around Ponds (xb,xv,xi,xp)	85d	12/14/92	4/9/93	
170	Borehole Drilling and Sampling/Piezometer Installation	11.3w	12/14/92	3/2/93	
171	Core Logging	15.2w	12/25/92	4/9/93	170SS+2w
172	Vadose Zone Monitoring Installation	3.2w	2/9/93	3/2/93	176
173	Interceptor Trench System (xb,xv,xi,xp)	32d	12/28/92	2/9/93	
174	Borehole Drilling and Sampling/Piezometer Installation	5.4w	12/28/92	2/2/93	
175	Core Logging	4.4w	1/11/93		174SS+2w
176	Vadose Zone Monitoring Installation	1.8w	1/21/93	2/2/93	174FF
177	Pond 207A (xb,xv,xi,xp)	111d	11/10/92	4/13/93	
178	Radiological Survey	5d	11/10/92	11/16/92	
179	Geophysics	5d	12/4/92	12/10/92	
180	Borehole Drilling and Sampling	4.6w	3/10/93	4/9/93	
181	Core Logging	3w	3/24/93		180SS+2w
182	Vadose Zone Monitoring Installation	1.6w	3/22/93	3/31/93	
183	Earthen Ponds "Original Ponds" (xb,xv,xi,xp)	63d	1/13/93	4/9/93	
184	Geophysics	2d	4/8/93	4/9/93	
185	Borehole Drilling & Sampling	8.4w	1/13/93	3/11/93	

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OU4 SOLAR PONDS PHASE I RFI/RI COMMITMENT SCHEDULE

ID	Task Name	Duration	Sched St		Predecessors
186	Core Logging	7.6w	1/27/93	3/19/93	185SS+2w
187	Vadose Zone Monitoring Installation	1.4w	3/3/93	3/11/93	
188	Radiologically Controlled Area (RCA) (xb,xv,xi,xp)	77d	1/8/93	4/26/93	
189	Borehole Drilling & Sampling	15.4w	1/8/93	4/26/93	
190	Core Logging	13.2w	1/22/93		189SS+2w
191	Vadose Zone Monitoring Installation	3d	2/22/93	2/24/93	
192	Drum Sampling	1w	4/20/93	4/26/93	189FF
193	Seismic Reflection/Refraction	2w	4/26/93	5/7/93	177FF
193	Land Survey	181d	11/18/92	7/29/93	
	Start Land Survey	b101	11/18/92	11/18/92	164SS+1w
195		0d	7/29/93	7/20/03	204FF-1w
196	Finish Land Survey	64d	3/22/93	6/17/93	20411-144
197	Other Vadose	4.8w	3/22/93	4/22/93	19255
198	Guelph Permeameter Tests	2w	4/23/93	5/6/93	10233
199	Soil Gas Survey		5/7/93		
200	Infiltrometer Installation	6w	5//193		1 199
201	Vadose Monitoring Activities	260d	4/26/93		10050 0 4
202	Lysimeter Sampling	52w	4/26/93		182FS+3.4w
203	Infiltrometer Testing	6w	5/28/93		200FS-3w
204	Demobilization	4w	7/9/93	8/5/93	203,188,183,177,173,169,166
205					
206	LAB ANALYSIS/TURNAROUND	295d	12/14/92	1/28/94	
207	Around Ponds	196.5d	12/14/92	9/14/93	
208	Non Rad Data Lab Analysis/Turnaround	116.5d	12/14/92	5/25/93	
209	Begin Non Rad Lab Analysis/Turnaround	0d	12/14/92	12/14/92	170SS
210	End Non Rad Lab Analysis/Turnaround	0d	. 5/25/93		170FS+60d
211	Rad Data Lab Analysis/Turnaround	146.5d	12/14/92	7/6/93	
212	Begin Rad Lab Analysis/Turnaround	0d	12/14/92	12/14/92	170SS
213	End Rad Lab Analysis/Turnaround	0d	7/6/93	7/6/93	170FS+90d
214	Receive Unvalidated Non Rad Data	56.5d	3/5/93	5/25/93	
215	Begin Receiving Unvalidated Non Rad Data	0d	3/5/93	3/5/93	209FS+60d
216	Receive Final Unvalidated Non Rad Data	0d	5/25/93	5/25/93	210
217	Receive Unvalidated Rad Data	56.5d	4/16/93	7/6/93	
218	Begin Receiving Unvalidated Rad Data	0d	4/16/93	4/16/93	212FS+90d
219	Receive Final Unvalidated Rad Data	0d	7/6/93	7/6/93	213
220	Validate Non Rad Data	106.5d	3/5/93	8/3/93	
221	Begin Validating Non Rad Data	0d	3/5/93	3/5/93	215
222	Finish Validating Non Rad Data	0d		8/3/93	216FS+50d
223	Validate Rad Data	106.5d	4/16/93	9/14/93	
224	Begin Validating Rad Data	b0:001	4/16/93		
	End Validating Rad Data	90	9/14/93		219FS+50d
225		56.5d			
226	Receive Validated Non Rad Data		5/14/93	5/14/02	221FS+50d
227	Begin Receiving Validated Non Rad Data	0d			
228	Receive Final Validated Non Rad Data	0d		8/3/93	222
229	Receive Validated Rad Data	56.5d	6/25/93	9/14/93	100/50 50/
230	Begin Receiving Validated Rad Data	0d			224FS+50d
231	Receive Final Validated Rad Data	0d		9/14/93	
232	Interceptor Trench System	167d			
233	Non Rad Data Lab Analysis/Turnaround	87d	12/28/92	4/27/93	;

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ID	Task Name	Duration	Sched St	Sched Fin	Predecessors
234	Begin Non Rad Lab Analysis/Turnaround	0d	12/28/92	12/28/92	174SS
235	End Non Rad Lab Analysis/Turnaround	0d	4/27/93	4/27/93	174FS+60d
236	Rad Data Lab Analysis/Turnaround	117d	12/28/92	6/8/93	
237	Begin Rad Lab Analysis/Turnaround	0d	12/28/92	12/28/92	174SS
238	End Rad Lab Analysis/Turnaround	0d	6/8/93	6/8/93	174FS+90d
239	Receive Unvalidated Non Rad Data	27d	3/19/93	4/27/93	
240	Begin Receiving Unvalidated Non Rad Data	b0	3/19/93	3/19/93	234FS+60d
241	Receive Final Unvalidated Non Rad Data	0d	4/27/93	4/27/93	235
242	Receive Unvalidated Rad Data	27d	4/30/93	6/8/93	
243	Begin Receiving Unvalidated Non Rad Data	0d	4/30/93	4/30/93	237FS+90d
244	Receive Final Unvalidated Rad Data	0d	6/8/93	6/8/93	238
245	Validate Non Rad Data	77d	3/19/93	7/6/93	
246	Begin Validating Non Rad Data	0d	3/19/93	3/19/93	240
247	Finish Validating Non Rad Data	Od	7/6/93	7/6/93	241FS+50d
248	Validate Rad Data	77d	4/30/93	8/17/93	2411 0 · 000
248		b//	4/30/93	4/30/93	242
249	Begin Validating Rad Data	D0	8/17/93	9/47/02	244FS+50d
250	End Validating Rad Data		5/28/93	7/6/93	244F5+500
251	Receive Validated Non Rad Data	27d	5/28/93		0.4650.504
252	Begin Receiving Validated Non Rad Data	0d	5/28/93		246FS+50d
253	Receive Final Validated Non Rad Data	00	7/6/93	7/6/93	247
254	Receive Validated Rad Data	27d	7/9/93	8/17/93	2/2/2 22 1
255	Begin Receiving Validated Rad Data	p0	7/9/93	7/9/93	249FS+50d
256	Receive Final Validated Rad Data	0d	8/17/93	8/17/93	250
257	Pond 207A	163d	3/10/93	10/22/93	
258	Non Rad Data Lab Analysis/Turnaround	84d	3/10/93	7/5/93	
259	Begin Non Rad Lab Analysis/Turnaround	0d	3/10/93	3/10/93	180SS
260	End Non Rad Lab Analysis/Turnaround	1d	7/5/93	7/5/93	180FS+60d
261	Rad Data Lab Analysis/Turnaround	113d	3/10/93	8/13/93	
262	Begin Rad Lab Analysis/Turnaround	0d	3/10/93	3/10/93	180SS
263	End Rad Lab Analysis/Turnaround	0d	8/13/93		180FS+90d
264	Receive Unvalidated Non Rad Data	24d	6/1/93	7/5/93	
265	Begin Receiving Unvalidated Non Rad Data	0d	6/1/93	6/1/93	259FS+60d
266	Receive Final Unvalidated Non Rad Data	0d	7/5/93	7/5/93	260
267	Receive Unvalidated Rad Data	23d	7/13/93	8/13/93	
268	Begin Receiving Unvalidated Non Rad Data	0d	7/13/93		262FS+90d
269	Receive Final Unvalidated Rad Data	0d	8/13/93	8/13/93	
270	Validate Non Rad Data	74d	6/1/93	9/13/93	
271	Begin Validating Non Rad Data	0d	6/1/93	6/1/93	
	Finish Validating Non Rad Data	0d	9/13/93		266FS+50d
272		73d	7/13/93	10/22/93	200F3+300
273	Validate Rad Data				
274	Begin Validating Rad Data	00	7/13/93	7/13/93	200
275	End Validating Rad Data	0d	10/22/93		269FS+50d
276	Receive Validated Non Rad Data	24d	8/10/93	9/13/93	
277	Begin Receiving Validated Non Rad Data	0d	8/10/93	8/10/93	271FS+50d
278	Receive Final Validated Non Rad Data	0d	9/13/93	9/13/93	272
279	Receive Validated Rad Data	23d	9/21/93	10/22/93	
280	Begin Receiving Validated Rad Data	D0	9/21/93	9/21/93	274FS+50d
281	Receive Final Validated Rad Data	0d	10/22/93	10/22/93	275

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OU4 SOLAR PONDS PHASE I RFI/RI COMMITMENT SCHEDULE

ĪŪ	Task Name	Duration	Sched St		Predecessors
282	Earthen Ponds	182d	1/13/93	9/23/93	
283	Non Rad Data Lab Analysis/Turnaround	102d	1/13/93	6/3/93	
284	Begin Non Rad Lab Analysis/Turnaround	0d	1/13/93	1/13/93	185SS
285	End Non Rad Lab Analysis/Turnaround	b0	6/3/93		185FS+60d
286	Rad Data Lab Analysis/Turnaround	132d	1/13/93	7/15/93	
287	Begin Rad Lab Analysis/Turnaround	0d	1/13/93	1/13/93	185SS
288	End Rad Lab Analysis/Turnaround	0d	7/15/93	7/15/93	185FS+90d
289	Receive Unvalidated Non Rad Data	42d	4/6/93	6/3/93	
290	Begin Receiving Unvalidated Non Rad Data	b0	4/6/93	4/6/93	284FS+60d
291	Receive Final Unvalidated Non Rad Data	D0	6/3/93	6/3/93	285
292	Receive Unvalidated Rad Data	42d	5/18/93	7/15/93	
293	Begin Receiving Unvalidated Non Rad Data	0d	5/18/93		287FS+90d
294	Receive Final Unvalidated Rad Data	0d	7/15/93	7/15/93	288
295	Validate Non Rad Data	92d	4/6/93	8/12/93	
296	Begin Validating Non Rad Data	0d	4/6/93	4/6/93	290
297	Finish Validating Non Rad Data	0d	8/12/93	8/12/93	291FS+50d
298	Validate Rad Data	92d	5/18/93	9/23/93	
299	Begin Validating Rad Data	0d	5/18/93	5/18/93	293
300	End Validating Rad Data	0d	9/23/93	9/23/93	294FS+50d
301	Receive Validated Non Rad Data	42d	6/15/93		
302	Begin Receiving Validated Non Rad Data	DO D	6/15/93	6/15/93	296FS+50d
303	Receive Final Validated Non Rad Data	Od	8/12/93	8/12/93	297
304	Receive Validated Rad Data	42d	7/27/93	9/23/93	
305	Begin Receiving Validated Rad Data	0d	7/27/93	7/27/93	299FS+50d
306	Receive Final Validated Rad Data	0d	9/23/93	9/23/93	
307	Radiologically Controlled Area (RCA)	217d	1/8/93	11/8/93	
308	Non Rad Data Lab Analysis/Turnaround	137d	1/8/93	7/19/93	
309	Begin Non Rad Lab Analysis/Turnaround	0d		1/8/93	189SS
310	End Non Rad Lab Analysis/Turnaround	0d	7/19/93	7/19/93	189FS+60d
311	Rad Data Lab Analysis/Turnaround	167d	1/8/93	8/30/93	
312	Begin Rad Lab Analysis/Turnaround	0d	1/8/93		189SS
313	End Rad Lab Analysis/Turnaround	0d	8/30/93	8/30/93	189FS+90d
314	Receive Unvalidated Non Rad Data	77d	4/1/93	7/19/93	
315	Begin Receiving Unvalidated Non Rad Data	0d	4/1/93	4/1/93	309FS+60d
316	Receive Final Unvalidated Non Rad Data	0d	7/19/93	7/19/93	310
317	Receive Unvalidated Rad Data	77d	5/13/93		
318	Begin Receiving Unvalidated Non Rad Data	0d			312FS+90d
319	Receive Final Unvalidated Rad Data	0d			
320	Validate Non Rad Data	127d	4/1/93		
321	Begin Validating Non Rad Data	0d	4/1/93		315
322	Finish Validating Non Rad Data	Od	9/27/93	9/27/93	316FS+50d
323	Validate Rad Data	127d	5/13/93		
	Begin Validating Rad Data	0d	5/13/93		
324	End Validating Rad Data	b0	11/8/93		319FS+50d
325		77d	6/10/93		
326	Receive Validated Non Rad Data		6/10/93	9/2/193	321FS+50d
327	Begin Receiving Validated Non Rad Data	0d			
328	Receive Final Validated Non Rad Data	0d			
329	Receive Validated Rad Data	77d	7/22/93	11/8/93	<u> </u>

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ID	Task Name	Duration	Sched St	Sahad Ein	Predecessors
330	Begin Receiving Validated Rad Data	Odi	7/22/93	Scried Fin	324FS+50d
331	Receive Final Validated Rad Data	b0	11/8/93	11/8/93	324F5+500
332	Environmental Evaluation	208.5d	4/13/93	1/28/94	
333	Non Rad Data Lab Analysis/Turnaround	128.5d	4/13/93		
334	Begin Non Rad Lab Analysis/Turnaround	0d	4/13/93	4/13/93	456SS
335	End Non Rad Lab Analysis/Turnaround	0d	10/8/93		456FS+60d
336	Rad Data Lab Analysis/Turnaround	158.5d	4/13/93	11/19/93	
337	Begin Rad Lab Analysis/Turnaround	0d	4/13/93	4/13/93	456SS
338	End Rad Lab Analysis/Turnaround	0d	11/19/93	11/19/93	456FS+90d
339	Receive Unvalidated Non Rad Data	68.5d	7/6/93	10/8/93	
340	Begin Receiving Unvalidated Non Rad Data	Dd	7/6/93	7/6/93	334FS+60d
341	Receive Final Unvalidated Non Rad Data	DO D	10/8/93	10/8/93	
342	Receive Unvalidated Rad Data	68.5d	8/17/93	11/19/93	
343	Begin Receiving Unvalidated Non Rad Data	p0	8/17/93		337FS+90d
344	Receive Final Unvalidated Rad Data	D0	11/19/93	11/19/93	338
345	Validate Non Rad Data	118.5d	7/6/93	12/17/93	
346	Begin Validating Non Rad Data	0d	7/6/93	7/6/93	340
347	Finish Validating Non Rad Data	0d	12/17/93	12/17/93	341FS+50d
348	Validate Rad Data	118.5d	8/17/93	1/28/94	
349	Begin Validating Rad Data	0d	8/17/93	8/17/93	343
350	End Validating Rad Data	0d	1/28/94		344FS+50d
351	Receive Validated Non Rad Data	68.5d	9/14/93	12/17/93	
352	Begin Receiving Validated Non Rad Data	0d	9/14/93	9/14/93	346FS+50d
353	Receive Final Validated Non Rad Data	0d	12/17/93	12/17/93	347
354	Receive Validated Rad Data	68.5d	10/26/93	1/28/94	
355	Begin Receiving Validated Rad Data	DO D	10/26/93	10/26/93	349FS+50d
356	Receive Final Validated Rad Data	DO l	1/28/94	1/28/94	
357					
358	BASELINE RISK ASSESSMENT	548d	1/1/92	2/4/94	
359	Data Collection & Evaluation	371d	9/4/92	2/4/94	
360	Collect Historic Data	27.4w	9/4/92	3/15/93	
361	Evaluate Historic Data	35d	3/16/93	5/3/93	360
362	Evaluate Non-Rad Data	210d	3/5/93	12/24/93	
363	Around Ponds	111.5d	3/5/93	8/10/93	
364	Start	D0	3/5/93		215SS
365	Finish	0d	8/10/93	8/10/93	228FS+1w
366	ITS	82d	3/19/93	7/13/93	
367	Start	0d	3/19/93	3/19/93	240
368	Finish	Od	7/13/93		253FS+1w
369	Pond 207A	79d	6/1/93	9/20/93	2001 0 - 111
370	Start	00	6/1/93		265SS
371	Finish	00	9/20/93		278FS+1w
372	Earthen Ponds	97d	4/6/93	8/19/93	
373	Start	97d	4/6/93	0/ 19/93	290SS
374	Finish	0d			
374			8/19/93		303FS+1w
	Radiologically Controlled Area (RCA)	132d	4/1/93	10/4/93	
376 377	Start Finish	0d	4/1/93		315SS
311	rinisn	0d	10/4/93	10/4/93	328FS+1w

			Sched St		NT SCHEDULE Predecessors
ID	Task Name	Duration 123.5d	7/6/93	12/24/93	
378	Environmental Evaluation	123.5d	7/6/93	7/6/03	340SS
379	Start	0d	12/24/93		353FS+1w
380	Finish	210d	4/16/93	2/4/94	333F3+1W
381	Evaluate Rad Data		4/16/93	9/21/93	
382	Around Ponds	111.5d	4/16/93	4/16/93	21000
383	Start	b0			231FS+1w
384	Finish	0d	9/21/93		231F3+1W
385	ITS	82d	4/30/93	8/24/93	04000
386	Start	0d	4/30/93	4/30/93	24388
387	Finish	0d	8/24/93		256FS+1w
388	Pond 207A	78d	7/13/93	10/29/93	
389	Start	0d	7/13/93	7/13/93	
390	Finish	0d	10/29/93	10/29/93	281FS+1w
391	Earthen Ponds	97d	5/18/93	9/30/93	
392	Start	p0	5/18/93		
393	Finish	DO l	9/30/93		306FS+1w
394	Radiologically Controlled Area (RCA)	132d	5/13/93	11/15/93	
395	Start	0d	5/13/93		318SS
396	Finish	0d	11/15/93		331FS+1w
397	Environmental Evaluation	123.5d	8/17/93		
398	Start	0d	8/17/93	8/17/93	343SS
399	Finish	0d	2/4/94		356FS+1w
400	Human Health Risk Assessment	268d	1/4/93		
401	Exposure Scenarios - TM4	91d			
402	Prepare Tech Memo	6.8w	1/4/93		
403	Submit Draft Tech Memo to EG&G/DOE	D0	2/19/93	2/19/93	402
404	EG&G/DOE Review	10d			
405	Incorporate Comments	5d	3/5/93		
406	Submit Revised Draft Tech Memo	0d	3/11/93		
407	Transmittal Processing - EPA/CDH	2d	3/12/93	3/15/93	
408	EPA/CDH Review	20d	3/16/93		
409	Resolve Comments and Finalize TM	10d			
410	Submit Final Tech Memo	b0			
411	EPA/CDH Final Approval	10d	4/27/93		
412	Exposure Models - TM5	97d			
413	Prepare Tech Memo	8w			
414	Submit Draft Tech Memo to EG&G/DOE	0d			
415	EG&G/DOE Review	10d		4/8/93	3 414
416	Incorporate Comments	5d			
417	Submit Draft Tech Memo	D0	4/15/93		
418	Transmittal Processing - EPA/CDH	2d	4/16/93		
710	Transmar resources =	304		5/17/03	140

Submit Draft Tech Memo to EG&G/DOE

Resolve Comments and Finalize Tech Memo

EPA/CDH Review

Submit Final Tech Memo

EPA/CDH Final Approval Contaminants of Concern - TM6

Prepare Tech Memo

419

420

421

422

423

424

425

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20d

10d

0d

10d

91d

6w

0d

4/20/93

5/18/93

5/31/93

6/1/93

9/7/93

9/7/93

10/18/93

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5/17/93 418

5/31/93 419 5/31/93 420

6/14/93 421

10/18/93 424

10/18/93 396FS-10w

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10	Task Nama	Duration	Sched St	Sched Fin	Predecessors
1D 426	Task Name EG&G/DOE Review	10d	10/19/93	11/1/93	
	Incorporate Comments	9d	11/2/93	11/12/93	426
427	Submit Revised Draft Tech Memo	0d	11/12/93	11/12/93	A27
428		2d	11/15/93	11/16/93	120
429	Transmittal Processing - EPA/CDH		11/17/93	12/14/93	
430	EPA/CDH Review	20d	12/15/93	12/14/93	429
431	Resolve Comments and Finalize TM	10d			
432	Submit Final Tech Memo	0d	12/28/93	12/28/93	431
433	EPA/CDH Final Approval	10d	12/29/93	1/11/94	432
434	Toxicity Assessment - TM7	82d	9/21/93	1/12/94	00050
435	Prepare Tech Memo	4w	9/21/93		396FS-8w
436	Submit Draft Tech Memo to EG&G/DOE	0d	10/18/93	10/18/93	435
437	EG&G/DOE Review	10d	10/19/93	11/1/93	436
438	Incorporate Comments	10d	11/2/93	11/15/93	
439	Submit Draft Tech Memo	0d	11/15/93	11/15/93	
440	Transmittal Processing - EPA/CDH	2d	11/16/93	11/17/93	
441	EPA/CDH Review	20d	11/18/93	12/15/93	
442	Resolve Comments and Finalize Tech Memo	10d	12/16/93	12/29/93	441
443	Submit Final Tech Memo	0d	12/29/93	12/29/93	
444	EPA/CDH Final Approval	10d	12/30/93	1/12/94	
445	Environmental Evaluation	514d	1/1/92	12/20/93	
446	Data Review, Consultations	6.5w	1/1/93	2/16/93	
447	Site Specific Conceptual Exposure Model	8w	2/16/93	4/13/93	
448	Transport Model to ID Potential Pathways	9w	2/9/93	4/13/93	446FS-5d
449	Select Target Taxa & Analytes	9w	2/9/93		446FS-5d
450	Field Investigations	45d	5/17/93	7/17/93	447,448,449
451	Biological & Habitat Site Surveys	30d	5/17/93	6/26/93	
452	Habitat Survey	6w	5/17/93	6/26/93	
453	Animal Survey	3d	5/17/93		
454	Vegetation Survey	6w	5/17/93	6/26/93	
455	Mammal Survey	2w	6/14/93	6/26/93	
456	Ecotoxicological Investigation	25d	6/14/93	7/17/93	
457	Soil Pits/Sampling	1w	7/12/93	7/17/93	
458	Small Mammal Sampling	1w	7/12/93		
459	Vegetation Sampling	1w	7/12/93	7/17/93	
460	Cottontail Sampling	5w	6/14/93		
461	EE Portion of BRA	453d	1/1/92	9/24/93	
462	EE Portion of BRA	126d	6/28/93		
463	Habitat Survey Report	3w	6/28/93	7/16/93	452
464	Biological Survey Report	15d	6/28/93	7/16/93	453,454,455
465	Ecotoxicological Report	55d	10/5/93	12/20/93	
466	Start Report	b0	10/5/93	10/5/93	396FS-6w
467	Finish Report	0d	12/20/93	12/20/93	396FS+5w
468					
469	DATA EVALUATION & REPORT PREPARATION	583d	9/4/92	11/29/94	
470	Collect Historic Data	27.4w	9/4/92	3/15/93	
471	Evaluate Historic Data	35d	3/16/93		
472	Prepare Draft Phase I RFI/RI Report	270d	1/25/93	2/4/94	358FF
473	Submit Draft Phase I RFI/RI Report to EG&G	0d	2/4/94		
110	1 Coomic Order Indoor I will report to Louis		1 277107	LINGT	<u> </u>

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OU4 SOLAR PONDS PHASE I RFI/RI COMMITMENT SCHEDULE						
ID	Task Name	Duration	Sched St	Sched Fin	Predecessors	
474	Transmittal Processing to DOE/HQ	5d	2/7/94	2/11/94		
475	DOE-HQ Review of Draft RFI/RI Report	21d	2/14/94	3/14/94		
476	EG&G/DOE-RFO Review of Draft RFI/RI Report	21d	2/14/94			
477	Incorporate Comments and Finalize	21d	3/15/94		475,476	
478	Transmittal Processing	5d	4/13/94			
479	Submit Draft RFI/RI Report to EPA/CDH	0d	4/19/94			
480	EPA/CDH Review Draft RFI/RI Report	62d	4/20/94	7/14/94		
481	Receive EPA/CDH Comments on Draft RFI/RI Report	0d	7/14/94	7/14/94		
482	Incorporate Comments and Finalize	42d	7/15/94			
483	Transmittal Processing	5d	9/13/94			
484	Submit Final RFI/RI Report	0d	9/19/94			
485	EPA/CDH Review of Final RFI/RI Report	21d	9/20/94			
486	Incorporate Comments and Finalize RFI/RI Report	25d	10/19/94	11/22/94		
487	Transmittal Processing to EPA/CDH	5d	11/23/94	11/29/94		
488	EPA/CDH Final Approval	b0	11/29/94	11/29/94	487	

ATTACHMENT D OU4 PHASE I RFI/RI PROJECT SUMMARY SCHEDULE

92 AUG SEP OCT NO V DEC JAN FEB MAR APR MAY JUN JUL AUG SEPT OCT NOV DEC JAN FEB MAR APR MAY JUN JUL AUG SEPT OCT •10/10/93 Original IAG MS •5/21/93 Projected IAG MS •4/19/94 •9/17/94 Phase I RFI/RI 12/14/92 Field Work (drilling/sampling) EE Field Work 5/17/93 Lab Turnaround (RI) 12/15/92 Data Validation (RI) 3/5/93 EE Lab Turnaround 6/15/93 EE Data Validation 7/30/93 (CDH/EPA Final Approval) 9/7/93 BRA HHRA TM7 RFI/RI Report

PORTIONS OF THE ABOVE ACTIVITIES ARE ON THE CRITICAL PATH

"RFI/RI PROJECT"

NOTE: